

RESPONSE TO DOCUMENT REQUESTS**DOCUMENTS ALREADY IN DEFENDANTS
POSSESSION PRIOR TO DEFENDANTS'
MOTION TO COMPEL, DE90****Request #1**

Option Contract - Lakeside to Saepia

CAP0015642-3

Deed: Lakeside to Jopal Jan. 3, 2001

ACK00326-00327

Deed: Jopal to Belmont Villas LLC Dec 30, 2003

CAP0043810; CAP0045949-45954

Deed: Belmont Villas LLC to IDA Dec. 30, 2003

CAP0152824

Deed: Belmont Villas LLC to IDA as of Oct. 2004

CAP0043799; CAP0045934-45939

Title Insurance Policy and report showing chain of title of entire property as of October 2004

CRD00823-851

Chain of Title dating from 1970 covering entire property as of 2005

CRD08730-73

Itemized list of all acquisition and preconstruction costs. All invoices and checks pertinent to the land acquisition and Third Note equity which were agreed to by defendants - produced to defendants by plaintiffs prior to Oct. 2004 and produced again in discovery.

CRD54971-54984; CAP0034467-0034661, ACK03591-03592; ACK3585-3588

Euro American, (referred by defendants), Promissory Note and satisfaction; Loan docs;

CRD40133, CRD40134; CRD40318, CRD40124, CRD40328-40331, CRD45923, CAP45957-45958

Sfoghi Mortgage and satisfaction

CAP0034643-5; CAP0045962-45967

Andreadis mortgages and satisfaction

AND00001-AND00085; CAP0034643-5; CAP0045959-45961; CAP0045968-45984

Independence Bank: mortgage and satisfaction; list of mortgage payments given to defendants by plaintiffs prior to Oct. 2004

CAP0034614-CAP0034624; ACK03452-3474; CAP0045985-45990

Nelson and Pope

attachment

Request # 48 & 49 -

Chord Associates LLC Operating Agreement - also sent Fedex to Atty. McGrath on May 18, 2009. There has been no change in ownership, employees or management since inception.

CRD48861-48878; CGMI 03537-03554; ACK00899-00916; CAP0006046-6069

Jopal Enterprises LLC Operating Agreement - also sent Fedex to Atty. McGrath on May 18, 2009. There has been no change in ownership, employees or management since inception.

CRD48843-48860; CGMI 06890-06907; ACK00917-009333

Jopal Associates Inc. Corporate Docs and Stock Certificate showing Plaintiff Saepia as 100% owner of all stocks since 1998. There has been no change in ownership, employees or management since inception.

sent Fedex to Atty. McGrath on May 18, 2009

Request #52

Contemplated sale of Belmont or membership interest

with Judge Tomlinson awaiting decision re: privilege

Request #53-54

Krystie Manor LP Partnership Agreement

ACK03621-03987

Krystie Manor Bankruptcy

ACK02080-02089; ACK02581-02785

Krystie Manor Homeowners Association

ACK03593-03620

Request 55

Roland Conde Bankruptcy Petition

CRD41965-CRD42005; ACK02786-02796. Entire Conde Bankruptcy in possession has been in possession of defendants prior to McGrath motion

Plaintiffs discovery submission

CRD38899-38910; CRD38911-38914; CRD38847-38884; CRD38885-38886; CRD42006-42009; CRD52596-52598; CRD52468-52475; CRD52402-52425; CRD52438-52461; CRD38887-38898; CRD52347-52361; CRD52316-52329; CRD52585-52593; CRD52763-52765; CRD52289-52300; CRD52733-52738; CRD38492; CRD53433-53436; CRD52562-52563; CRD52594-52595; CRD52739-52742; CRD52761-72762; CRD52790-52793; CRD52564-52572; CRD52763-52765; CRD52234-52235; CRD53423; CRD53424-53425; CRD52628-52635; CRD52766-52770; CRD52407-52425; CRD52238-52239; CRD52247-52248; CRD52492-52496; CRD52497-52499; CRD52486-52488; CRD52501; CRD52751-52752, CRD52564; CRD38482; CRD52729

Lakeside Bankruptcy

ACK02786-2829

Sfoghi Bankruptcy

ACK02244-02362